

EXHIBIT 2

Victor Otten

From: Richard P. Dieffenbach <RDieffenbach@veatchfirm.com>
Sent: Thursday, December 29, 2016 4:22 PM
To: Jennifer A. Foldvary; John Worgul; Peter Crossin; Marianne Gadhia; John E. Stobart; Rob Mackey; Cooper, Robert S.
Cc: Kurt A. Franklin; Victor Otten; Samantha Wolff; kavita@ottenlawpc.com.; Ann D. Ghiorso; Hillary Plymate; Laura L. Bell; Mark C. Fields; peter@havenlaw.com; Ed.Richards@kutakrock.com; Jacob.Song@KutakRock.com; Antoinette.Hewitt@KutakRock.com; rebecca.wilson@kutakrock.com; tphillips@thephillipsfirm.com; amiller@thephillipsfirm.com; Dana.Fox@lewisbrisbois.com; Edward.Ward@lewisbrisbois.com; eric.kizirian@lewisbrisbois.com; tera.lutz@lewisbrisbois.com; Patrick Au; dmcrowley@boothmitchel.com; Landon D. Bailey; pat@patcareylaw.com
Subject: RE: Spencer v. Lunada Bay Boys - Motion to Compel (Brant Blakeman)
Attachments: MTN-Joint Statemtn for plf motion against Blakeman.DOCX; PLD-Dec of RPD re plf MTC.doc; PLD-EXHS 2 AND 3 TO RPD DEC RE MTC.PDF

Counsel:

Attached are Mr. Blakeman's portions of the Joint Statement, a declaration of Mr. Dieffenbach, and two exhibits for attachment to the Dieffenbach declaration, for inclusion in the filing. Please submit the final product for review to Mr. Cooper, Mr. Worgul and myself before approval to attach signatures can be provided.

Additionally we will need to meet as to Mr. Blakeman's motion per the court's recent order. I propose January 4 at 11 a.m. in my office. See you then.

Richard Dieffenbach
Veatch Carlson LLP

From: Jennifer A. Foldvary [mailto:JFoldvary@hansonbridgett.com]
Sent: Thursday, December 22, 2016 3:58 PM
To: John Worgul; Richard P. Dieffenbach; Peter Crossin; Marianne Gadhia; John E. Stobart; Rob Mackey
Cc: Kurt A. Franklin; 'vic@ottenlawpc.com'; Samantha Wolff; 'kavita@ottenlawpc.com.'; Ann D. Ghiorso; Hillary Plymate; Laura L. Bell; Mark C. Fields; peter@havenlaw.com; Ed.Richards@kutakrock.com; Jacob.Song@KutakRock.com; Antoinette.Hewitt@KutakRock.com; rebecca.wilson@kutakrock.com; tphillips@thephillipsfirm.com; amiller@thephillipsfirm.com; Dana.Fox@lewisbrisbois.com; Edward.Ward@lewisbrisbois.com; eric.kizirian@lewisbrisbois.com; tera.lutz@lewisbrisbois.com; Patrick Au; dmcrowley@boothmitchel.com; Landon D. Bailey; 'rcooper@buchalter.com'; 'pat@patcareylaw.com'
Subject: Spencer v. Lunada Bay Boys - Motion to Compel (Brant Blakeman)

Counsel:

I have attached a Word version of the Joint Stipulation for Plaintiff's Motion to Compel Production of Documents by Defendant Brant Blakeman. I have also attached the Declaration of Victor Otten in support thereof, with accompanying exhibits.

Please add your portion to the Joint Stipulation and return it to me within 7 days in accordance with Local Rule 37-2.2.

Jennifer